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7 Attorneys for Plaintiff Jeffrey I. Golden,
Chapter 7 Trustee
8

9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA**
11 **SANTA ANA DIVISION**

12 In re Case No. 8:21-bk-11710-SC
13 JAMIE LYNN GALLIAN, Chapter 7
14 Debtor.

15 JEFFREY I. GOLDEN, Chapter 7 Trustee, Adv. No. 8:23-ap-01064-SC
16 Plaintiff,
17 vs.
18 J-SANDCASTLE CO., LLC; J-PAD LLC;
19 STEVEN D. GALLIAN; BRIAN J.
GALLIAN; JUSTIN BARCLAY; RONALD
20 J. PIERPONT; ROBERT J. MCLELLAND;
AND E.J. GALLIAN,
21 Defendants.

**NOTICE OF ERRATA RE MOTION FOR
DEFAULT JUDGMENT UNDER LBR
7055-1 (J-SANDCASTLE CO., LLC)**

Date: May 7, 2024
Time: 1:30 p.m.
Place: Courtroom 5C
411 W. Fourth Street
Santa Ana, California 92701

23 TO THE HONORABLE JUDGE SCOTT C. CLARKSON, DEFENDANTS, AND INTERESTED
24 PARTIES:

25 PLEASE TAKE NOTICE that on March 27, 2024, Jeffrey I. Golden, the Chapter 7 Trustee
26 for the bankruptcy estate of Jamie Lynn Gallian (“Plaintiff”), filed his Motion for Default
27 Judgment Under LBR 7055-1 against J-Sandcastle Co., LLC (the “Motion”) (*docket no. 59*).
28

The Plaintiff unintentionally failed to attach a copy of the proposed default judgment to the Motion. A copy of the proposed default judgment that Plaintiff will lodge and serve on J-Sandcastle Co., LLC in connection with the Motion is attached as Exhibit A hereto.

DATED: April 4, 2024

DANNING, GILL, ISRAEL & KRASNOFF, LLP

By: /s/ Aaron E. de Leest
AARON DE LEEST
SHANTAL MALMED
Attorneys for Plaintiff Jeffrey I. Golden,
Chapter 7 Trustee

EXHIBIT A

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**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SANTA ANA DIVISION**

13 In re Case No. 8:21-bk-11710-SC
14 JAMIE LYNN GALLIAN, Chapter 7
15 Debtor.

16 JEFFREY I. GOLDEN, Chapter 7 Trustee,
17 Plaintiff,
18
19 vs.
20 J-SANDCASTLE CO., LLC; J-PAD LLC;
21 STEVEN D. GALLIAN; BRIAN J.
GALLIAN; JUSTIN BARCLAY; RONALD
J. PIERPONT; ROBERT J. MCLELLAND;
22 AND E.J. GALLIAN,
Defendants.

Case No. 8:21-bk-11710-SC

Chapter 7

Adv. No. 8:23-ap-01064-SC

**[PROPOSED] DEFAULT JUDGMENT
AGAINST J-SANDCASTLE CO., LLC**

Date: May 7, 2024

Time: 1:30 p.m.

Place: Courtroom 5C

411 W. Fourth Street
Santa Ana, California 92701

On May 7, 2024, the Court heard and considered the Plaintiff's Motion for Default Judgment under LBR 7055-1 against Defendant J-Sandcastle Co., LLC (the "Motion") filed by Plaintiff Jeffrey I. Golden, as the Chapter 7 Trustee (the "Trustee" or "Plaintiff") for the bankruptcy estate of Jamie Lynn Gallian (the "Debtor").

1 The Court having read and considered the Motion, having found that notice of the Motion
2 was adequate and proper, having noted the lack of any response and that the Clerk of the Court
3 entered the default of Defendant J-Sandcastle Co., LLC (“Defendant”) on August 22, 2023, and
4 good cause appearing:

5 IT IS ORDERED, ADJUDGED AND DECREED THAT:

- 6 1. The Motion is granted.

7 2. Default judgment is entered in favor of the Plaintiff and against the Defendant on

8 the Plaintiff's first claim for relief in the Complaint.

9 3. The Debtor's transfers of the manufactured home located at and commonly known

0 as 16222 Monterey Lane, Space #376, Huntington Beach, CA 92649, Decal # LBM1081, Serial #

1 AC7V710394GA, AC7V710394GB (the "Property") to the Defendant, including transferring title

2 to the Property on or about November 15, 2018 and November 20, 2018, are hereby avoided and

3 legal title to the Property and the beneficial interest in the Property is recovered for the benefit of

4 the bankruptcy estate.

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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is 1901 Avenue of the Stars, Suite 450, Los Angeles, CA 90067-6006.

A true and correct copy of the foregoing document entitled (*specify*): NOTICE OF ERRATA RE MOTION FOR DEFAULT JUDGMENT UNDER LBR 7055-1 (J-SANDCASTLE CO., LLC) will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) April 4, 2024 I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Service information continued on attached page.

2. SERVED BY UNITED STATES MAIL:

On (*date*) April 4, 2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page.

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state

method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) _____, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

Service information continued on attached page.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

April 4, 2024

Date

Beverly Lew

Printed Name

/s/ Beverly Lew

Signature

ADDITIONAL SERVICE INFORMATION (if needed):

1. SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING ("NEF")

- **Bradford Barnhardt** bbarnhardt@marshackhays.com, bbarnhardt@ecf.courtdrive.com, alinares@ecf.courtdrive.com
- **Aaron E. DE Leest** adeleest@DanningGill.com, danninggill@gmail.com; adeleest@ecf.inforuptcy.com
- **Robert P Goe** kmurphy@goforlaw.com, rgoe@goforlaw.com; goeforecf@gmail.com
- **Jeffrey I Golden (TR)** lwerner@go2.law, jig@trustesolutions.net; kadele@go2.law; C205@ecfcbis.com
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- **Laila Masud** lmasud@marshackhays.com, lmasud@ecf.courtdrive.com; lbuchanan@marshackhays.com; alinares@ecf.courtdrive.com
- **United States Trustee (SA)** ustpregion16.sa.ecf@usdoj.gov

2. SERVED BY U.S. MAIL

J-Sandcastle Co., LLC
Jamie Lynn Gallian, Managing
Member
16222 Monterey Ln Unit 376
Huntington Beach, CA 92649

The Honorable Scott C. Clarkson
U.S. Bankruptcy Court
Ronald Reagan Federal Building
411 W. Fourth Street, Suite 5130
Santa Ana, CA 92701